

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
	:	
CHERLY A. VAUGHN-CURRY, a/k/a	:	CASE NO: 16- 17726ELF
CHERLY B. CURRY	:	
CHERLY CURRY	:	
CHERLY VAUGHN	:	
	:	
Debtors	:	
_____	:	

**CERTIFICATION OF NO RESPONSE TO DEBTOR'S MOTION  
TO MODIFY PLAN POST-CONFIRMATION**

The Debtor, through counsel, hereby avers:

1. On July 31, 2017, Debtor filed the above-captioned motion (the "Motion").
2. On July 31, 2017, the Motion and Notice of Motion was served on all secured and priority creditors. August 14, 2017.
3. Pursuant to Local Bankruptcy Rule 9014-3(i), any response to the Motion was due on July 28, 2017.
4. As of this date, no response has been filed to the Motion.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid  
ALFONSO MADRID, ESQ.  
Attorney for Debtor  
757 South 8<sup>th</sup> St.  
Philadelphia PA 19147  
(215) 925-1002  
(215) 689-4809 (fax)